EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

ePLUS, INC.,)
)
) Civil Action No. 3:09-cv-620
Plaintiff,)
)
v.)
)
LAWSON SOFTWARE, INC.)
)
)
Defendant.)

<u>DEFENDANT LAWSON SOFTWARE, INC.'S SUPPLEMENTAL RESPONSES TO</u> INTERROGATORY NOS. 1, 10, 17, 21, 24

Pursuant to Rules 26(e) and 33 of the Federal Rules of Civil Procedure, Defendant Lawson Software, Inc., ("Lawson") hereby supplements its responses to Plaintiff ePlus, Inc.'s ("ePlus") Interrogatory Nos. 1, 10, 17, 21, 24 as set forth below.

GENERAL OBJECTIONS

Lawson incorporates the General Objections set forth in its initial responses to Plaintiff's First Set of Interrogatories (Nos. 1-14).

INTEROGATORIES

INTERROGATORY NO. 1:

Identify each person, including, without limitation, all employees, representatives, officers or agents of Lawson or any third parties, whom Lawson knows or has reason to believe has knowledge or information concerning any factual information relevant to the validity or invalidity, enforceability or unenforceability, or infringement or noninfringement of any of the claims of the patents in suit, or of damages issues in this lawsuit, or of factual information relevant to any allegation of the Complaint or Lawson's answers to any interrogatories served upon it in this case, and state the nature and substance of each such person's knowledge or information, including whether such person furnished information or was consulted regarding Lawson's answers to interrogatories.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:

Lawson incorporates its previous objections and responses. Subject to and without waiving its objections, Lawson responds that it has reason to believe that the following individuals have knowledge or information relevant to the issues of this case:

- Kenneth Farber (President of ePlus) knowledge of ePlus [relevant to invalidity, noninfringement, damages]
- Phillip Norton (CEO of ePlus) knowledge of ePlus [relevant to invalidity, noninfringement, damages]
- Steven Mencarini (CFO of ePlus) knowledge of ePlus [relevant to invalidity, noninfringement, damages]
- Harry Debes (President and CEO of Lawson) knowledge of Lawson [relevant to invalidity, noninfringement, damages]
- Richard Lawson (Co-founder of Lawson) knowledge of Lawson [relevant to invalidity, noninfringement, damages]
- Hannah Raleigh (Practice Director of Lawson) knowledge of Lawson [relevant to invalidity, noninfringement, damages]
- Guenther Tolkmit (Senior Vice President Product Development of Lawson) knowledge of Lawson products [relevant to invalidity, noninfringement, damages]
- Robert Schriesheim (former Executive Vice President and CFO of Lawson) knowledge of Lawson financials [relevant to invalidity, noninfringement, damages]
- Kenneth White (Director of Revenue Operations of Lawson) knowledge of Lawson financials [relevant to invalidity, noninfringement, damages]
- Vicky Williams (Novant Health) knowledge as Lawson customer [relevant to invalidity, noninfringement, damages]
- William Ray Yuhasz (Novant Health) knowledge as Lawson customer [relevant to invalidity, noninfringement, damages]
- Lynn Cimino (South Jersey Healthcare) knowledge as Lawson customer [relevant to invalidity, noninfringement, damages]
- Robert Irwin (Robert Wood Johnson University) knowledge as Lawson customer [relevant to invalidity, noninfringement, damages]
- Manuel Matias (Robert Wood Johnson University) knowledge as Lawson customer [relevant to invalidity, noninfringement, damages]
- Kristy Oliver (Blount Memorial Hosp) knowledge as Lawson customer [relevant to invalidity, noninfringement, damages]
- Johanna O'Loughlin knowledge of the Fisher prior art [relevant to invalidity, noninfringement, damages]

INTERROGATORY NO. 2:

With respect to any of Lawson's Electronic Sourcing and Procurement System(s) and/or Service(s) and/or operations, using a claim chart, state in detail Lawson's bases for any assertions of non-infringement of each of the patents in suit on a claim-by-claim, element-by element basis. Your answer should include a statement of Lawson's interpretation of each claim element

implemented any of the above-identified modules from May 2003 to the present, and the combinations/configurations/arrangements of such modules for each such customer during this period of time.

FIFTH SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 24:

Lawson incorporates its previous objections and responses. Subject to and without waiving its objections, Lawson also incorporates into this response as if fully provided herein its response to ePlus's Interrogatory No. 10. Lawson further identifies the following documents by Bates number as having responsive information: L0415816, L0415817, and L0415818.

Dated: May 18, 2010

LAWSON SOFTWARE, INC.

Daniel McDonald, pro hac vice
William D. Schultz, pro hac vice
Rachel C. Hughey, pro hac vice
Joshua P. Graham, pro hac vice
Andrew Lagatta, pro hac vice
Merchant & Gould
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 332-5300

Facsimile: (612) 332-9081
dmcdonald@merchantgould.com
wschultz@merchantgould.com
rhughey@merchantgould.com
jgraham@merchantgould.com
alagatta@merchantgould.com

Kirstin L. Stoll-DeBell, pro hac vice Merchant & Gould 1050 Seventeenth Street Suite 1950 Denver, CO 80265

Telephone: (303) 357-1670 Facsimile: (303) 357-1671

kstoll-debell@merchantgould.com

Dabney J. Carr, IV (VSB No. 28679) Robert A. Angle (VSB No. 37691) dabney.carr@troutmansanders.com robert.angle@troutmansanders.com **Troutman Sanders LLP** 1001 Haxall Point

Richmond, VA 23219 Telephone: (804) 697-1200 Facsimile: (804) 697-1339

Counsel for Defendant Lawson Software, Inc.